

LAW OFFICES OF
FREDERICK L. SOSINSKY

52 DUANE STREET, 7TH FLOOR
NEW YORK, NEW YORK 10007

TELEPHONE (212) 285-2270

TELECOPIER (212) 732-6323

EMAIL: Freds@newyork-criminaldefense.com

April 17, 2017

BY ECF

Honorable Madeline Cox Arleo
United States District Judge
District of New Jersey
Martin Luther King Jr. Federal Building
& U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: United States v. Xue Yong Liu a/k/a Jack Liu
Criminal Docket No. 17-00023-MCA

Dear Judge Arleo:

As you are aware, I represent Xue Yong Liu, a/k/a Jack Liu, in the above matter. Sentencing for Mr. Liu is presently scheduled for May 10, 2017.

I am writing to you to respectfully request that the conditions of Mr. Liu's appearance bond be modified so as to permit him to take possession of his Chinese passport from Pretrial Services for one day for the purpose of furnishing such passport to and obtaining from the Chinese consulate located on 12th Avenue in Manhattan a visa permitting his newborn daughter Ivy to travel with his wife Vivian to China later this spring/summer. Mr. Liu's family and in-laws in China have not yet met the baby. I have been advised that both parents must provide as identification their original passports in order for a minor to be granted such a travel visa. Mr. Liu would pick up the passport in Newark, travel to the consulate, apply for the visa for his daughter and then return the passport to Newark either the very same day or the next day.

AUSA Dennis Carletta has no objection to this application and Pretrial has indicated they will defer to the Government. Pretrial also reports that Mr. Liu has been fully cooperative and complied with all conditions imposed upon him.

Thank you for your consideration.

Respectfully submitted,

Frederick L. Sosinsky

FLS:bms

cc: PTS Officer Leslie Richardson (by email)

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